

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

**KYKO GLOBAL, INC., a Canadian
corporation, KYKO GLOBAL GmbH, a
Bahamian corporation, PRITHVI
SOLUTIONS, INC., a Delaware Corporation,**

Plaintiffs,

v.

**PRITHVI INFORMATION SOLUTIONS,
LTD, an Indian corporation, VALUE TEAM
CORPORATION, a British Virgin Islands
corporation, SSG CAPITAL PARTNERS I,
L.P., a Cayman Islands Limited Partnership,
SSG CAPITAL MANAGEMENT (HONG
KONG) LIMITED, a private Hong Kong
company, MADHAVI VUPPALAPATI, an
individual, ANANDHAN JAYARAMAN, an
Individual, SHYAM MAHESHWARI, an
individual, IRA SYAVITRI NOOR A/K/A
IRA NOOR VOURLOUMIS, an individual,
DINESH GOEL, an individual, WONG
CHING HIM a/k/a Edwin Wong, an
individual, ANDREAS VOURLOUMIS, an
individual, PRITHVI ASIA SOLUTIONS
LIMITED, a Hong Kong company,**

Defendants.

Civil Action No. 2:18-cv-01290-WSS

Electronically Filed

NOTICE OF APPEARANCE

To the Clerk of this Court:

1. Please kindly enter the special and limited appearance of the undersigned on behalf of Value Team Corporation (“VTC”), formerly a British Virgin Islands corporation, in the above-captioned matter. Counsel’s appearance on behalf of VTC is not intended to and does not

waive VTC's objections to this Court's personal jurisdiction over VTC, or any of the SSG Defendants.

2. VTC has been an inactive and defunct entity since 2016. Nevertheless, Plaintiffs have sought liability against VTC—including an improper attempt to obtain a default judgment against VTC in this case—in an effort to pursue that judgment against certain of the SSG Defendants. *See* ECF Nos. 46 and 48; *see also* ECF No. 53 ¶ 16 n.3 (“As set forth in PSI's Default Judgment Motion, VTC is controlled and operated by Defendants Shyam Maheshwari, Ira Noor Vourloumis, Andreas Vourloumis ..., and Edwin Wong, all of whom comprise [*sic*] part of the SSG Defendants.”).

3. More recently, Plaintiffs have attempted to serve discovery directed to VTC on counsel for the SSG Defendants.

4. Out of an abundance of caution, the undersigned enter their appearance on behalf of VTC in order to protect the interests of the SSG Defendants against any attempts by Plaintiffs to obtain a judgment against VTC and then pursue that judgment against the SSG Defendants.

5. With this entry of appearance, the undersigned are willing to accept service on behalf of VTC, which has not been accomplished to date.

Dated: September 18, 2019

Respectfully submitted,

/s/ John D. Goetz
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John D. Goetz (Pa. Bar #47759)
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Management (Hong Kong) Limited,
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Wong Ching Him a/k/a Edwin Wong,
Andreas Vourloumis, and Value Team
Corporation**